

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

M. DIANE KOKEN, in her official capacity	:	
as Insurance Commissioner of the Commonwealth	:	
of Pennsylvania, as Liquidator of RELIANCE	:	CIVIL ACTION
INSURANCE COMPANY (IN LIQUIDATION)	:	
	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	NO. 05-CV-223 (SLR)
GPC INTERNATIONAL, INC.	:	
	:	
Defendant.	:	
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GPC INTERNATIONAL, INC.	:	
	:	
Third-Party Plaintiff,	:	
	:	
v.	:	
	:	
ZURICH-AMERICAN INSURANCE COMPANY	:	
	:	
Third-Party Defendant.	:	

**PLAINTIFF'S MOTION *IN LIMINE* TO PRECLUDE INTRODUCTION OF
DOCUMENTS PRODUCED TO DEFENDANT BY THE CALIFORNIA
INSURANCE GUARANTY ASSOCIATION PURSUANT TO SUBPOENA**

Plaintiff, M. Diane Koken, in her official capacity as Insurance Commissioner of the Commonwealth of Pennsylvania, as Liquidator (the “Liquidator”) of Reliance Insurance Company (In Liquidation) (“Reliance”), by and through her counsel, Fox Rothschild LLP, hereby moves this Honorable Court *in Limine* to preclude Defendant GPC International, Inc. (“GPC”) from introducing at trial of this matter any documents produced to GPC by the California Insurance Guaranty Association pursuant to subpoena on the basis that GPC wrongfully refused to provide copies of those documents to the Liquidator and the documents are

unauthenticated hearsay. In support of her motion, the Liquidator relies upon the attached Memorandum of Law, the substance of which is incorporated herein by reference. Pursuant to District of Delaware Local Rule 7.1.4, the Liquidator requests oral argument on this Motion.

Respectfully submitted,

/s/ Sheldon K. Rennie (#3772)

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*M. Diane Koken, in her official capacity
as Insurance Commissioner of the
Commonwealth of Pennsylvania,
as Liquidator of Reliance Insurance
Company (In Liquidation)*

Dated: August 8, 2006